

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

GEORGE A. HEDICK, JR., *individually and
on behalf of all others similarly situated,*

Plaintiff,

v.

THE KRAFT HEINZ COMPANY, *et al.*,

Defendants.

Case No. 19-1339 (RMD)

CLASS ACTION

IRON WORKERS DISTRICT COUNCIL
(PHILADELPHIA AND VICINITY)
RETIREMENT AND PENSION PLAN,
*individually and on behalf of all others
similarly situated,*

Plaintiff,

v.

THE KRAFT HEINZ COMPANY, *et al.*,

Defendants.

Case No. 19-1845 (RMD)

CLASS ACTION

TIMBER HILL LLC, *individually and on
behalf of all others similarly situated,*

Plaintiff,

v.

THE KRAFT HEINZ COMPANY, *et al.*

Defendants.

Case No. 19-2807 (RMD)

CLASS ACTION

DECLARATION OF CAROL V. GILDEN

I, Carol V. Gilden, declare under penalty of perjury under the laws of the United States of America that the following is true and correct.

1. I am a Partner at the law firm of Cohen Milstein Sellers & Toll PLLC (“Cohen Milstein”) and I am a member in good standing of the bar of the State of Illinois and I am admitted to practice in the United States District Court for the Northern District of Illinois. I serve as counsel for the New York City Funds (“NYC”).

2. Attached as **Exhibit A** is a true and correct copy of the Declaration of Alan H. Kleinman, and its accompanying Exhibits 1 and 2.

3. Attached as **Exhibit B** is a true and correct copy of the Declaration of David Jeter.

4. Attached as **Exhibit C** is a true and correct copy of the Reply Memorandum of Law of the Fire and Police Pension Association of Colorado and the San Antonio Fire and Police Pension Fund, filed by Gerald H. Silk of Bernstein Litowitz Berger & Grossmann LLP, in *Alaska Electrical Pension Fund v. Kerr-McGee Corp. et al.*, Case No. 09-6220, Dkt. 42 (S.D.N.Y. Sept. 25, 2019).

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: June 7, 2019

/s / Carol V. Gilden
Carol V. Gilden